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Clerk, U.S. District Court District Of Montana Billings

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ATTORNEYS FOR PLAINTIFF UNITED STATES OF AMERICA

IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF MONTANA MISSOULA DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

VS.

PAUL WENCEWICZ, SCOTT LONG, PHILLIP MORRIS, JOHN JOHNSON, CR 13-30-M-DWM

SUPERSEDING INDICTMENT

CHILD EXPLOITATION ENTERPRISE

18 U.S.C. § 2252A(g)

(Count I)

(Penalty: Mandatory minimum 20 years to life imprisonment, \$250,000 fine, and five years to life supervised release)

STEVE HUMISTON,
JEFFREY WOOLLEY, TONY
BRONSON, CHARLES
CROSBY, JOSEPH
PURIFICATO, JEFFREY
NOENNIG, JOSHUA
PETERSEN, STEVEN GROVO,
and IAN NOSEK,

Defendants.

CONSPIRACY TO ADVERTISE CHILD PORNOGRAPHY

18 U.S.C. § 2251(d) & (e)

(Count II)

(Penalty: Mandatory minimum 15 to 30 years imprisonment, \$250,000 fine, and five years to life supervised release. PENALTIES MAY BE ENHANCED FOR PRIOR CHILD SEX CRIME CONVICTION – 18 U.S.C. § 2251(e))

OBSTRUCTION OF JUSTICE

18 U.S.C. §§ 1519 and 2

(Count III)

(Penalty: 20 years imprisonment, \$250,000 fine,

and three years supervised release)

PENALTIES FOR REGISTERED SEX OFFENDERS

Title 18 U.S.C. § 2260A

(Counts IV)

Penalty: Mandatory term of imprisonment of 10

years in addition to and consecutive to imprisonment imposed for Count I & II, \$250,000 fine, and five years to lifetime

supervised release)

FORFEITURE ALLEGATION

18 U.S.C. § 2253(a)

THE GRAND JURY CHARGES:

COUNT I

On or about November 6, 2009, and continuing through on or about March 19, 2012, at Polson, in the State and District of Montana and elsewhere, the defendants PAUL WENCEWICZ, SCOTT LONG, PHILLIP MORRIS, JOHN JOHNSON, STEVE HUMISTON, JEFFREY WOOLLEY, TONY BRONSON,

CHARLES CROSBY, JOSEPH PURIFICATO, JEFFREY NOENNIG, JOSHUA PETERSEN, STEVEN GROVO, and IAN NOSEK, together, and with others known and unknown to the Grand Jury, engaged in a child exploitation enterprise, that is the above defendants violated Title 18 U.S.C. § 2252(a)(2) and (a)(4)(B), as part of a series of felony violations constituting three or more separate incidents and involving more than one victim, and committed those offenses in concert with three or more persons, in violation of 18 U.S.C. § 2252A(g).

COUNT II

On or about November 6, 2009, and continuing through on or about March 19, 2012, at Polson, in the State and District of Montana and elsewhere, the defendants PAUL WENCEWICZ, SCOTT LONG, PHILLIP MORRIS, JOHN JOHNSON, STEVE HUMISTON, JEFFREY WOOLLEY, TONY BRONSON, CHARLES CROSBY, JOSEPH PURIFICATO, JEFFREY NOENNIG, JOSHUA PETERSEN, STEVEN GROVO, and IAN NOSEK, together, and with others known and unknown to the Grand Jury, knowingly agreed and conspired to violate 18 U.S.C. § 2251(d), all in violation of 18 U.S.C. § 2251(e).

COUNT III

That between on or about March 15 and March 19, 2012, at Polson, in the State and District of Montana and elsewhere, the defendant PAUL WENCEWICZ, knowingly altered, destroyed, concealed, and covered up a record and document

with the intent to impede, obstruct, and influence the investigation and proper administration of any matter within the jurisdiction of an agency of the United States, namely the Federal Bureau of Investigation, and in relation to and contemplation of any such matter and case, and did aid and abet the same, in violation of 18 U.S.C. §§ 1519 and 2.

COUNT IV

That on or about November 10, 2009, and continuing through on or about February 27, 2012, at Polson, in the State and District of Montana and elsewhere, the defendant, STEVEN GROVO, an individual required by Federal and other law to register as a sex offender, committed a felony offense involving a minor under 18 U.S.C. § 2251, in violation of 18 U.S.C. § 2260A.

FORFEITURE ALLEGATION

As a result of the commission of the crimes described above, and upon conviction, the defendants, PAUL WENCEWICZ, SCOTT LONG, PHILLIP MORRIS, JOHN JOHNSON, STEVE HUMISTON, JEFFREY WOOLLEY, TONY BRONSON, CHARLES CROSBY, and JOSEPH PURIFICATO, JEFFREY NOENNIG, JOSHUA PETERSEN, STEVEN GROVO, and IAN NOSEK shall forfeit to the United States, all right, title and interest in the following described property that represents property used to commit the offenses or containing any visual depiction in violation of §§ 2251 and 2252:

Paul Wencewicz

- (1) Unbonded System Unit, Serial Number8619A033900182 to include the following hard drives:
 - a. Western Digital HDD, Serial Number WCATR0150632;
 - b. Seagate HDD, Serial Number 5MT1A554; and
 - c. Seagate HDD, Serial Number 6RY4R9FE;
- (2) Eagle HDD, Serial Number EH00022638;
- (3) Western Digital HDD, Serial Number WCAU4D609664;
- (4) Seagate HDD, Serial Number 5MA9HN5Z;
- (5) Adaptec HDD, Serial Number 050002227; and
- (6) Miscellaneous CDs and DVDs;

Phillip Morris

- (1) Western Digital Portable Hard Drive, 640GBm Serial Number: WCAUF217302;
- (2) PNY USB 16GB;
- (3) JOGR USB 2GB;
- (4) PNY USB 1GB;
- (5) Unbranded USB, University of Louisville Logo;
- (6) Unbranded USB 8GB;
- (7) HTC EVO 4G PC36100 Cellular Phone, Serial Number HT16PHL23668;
- (8) eMachine, Serial Number GMCRZ91, with internal Western Digital Hard Drive WD10EADS, Serial Number WD-WCAV58985559;
- (9) 2TB Western Digital Hard Drive, Serial Number WCAZA264177.6T;
- (10) Dane Electric USB 4GB Flash Card; and
- (11) PNY 4GB Flash Card;

John Johnson

- (1) Hewlett-Packard 100b All-in-One, Serial Number 4CS11408N8 with internal Hitachi HDD Serial Number HDS721025CLA382;
- (2) Western Digital 1200U017 USB Hard Drive, Serial Number WXEZ06701299; and
- (3) Iomega 31829800 USB Hard Drive, Serial Number YCCA020987;

Steve Humiston

(1) Dell Computer, Serial Number BYPZCKI with internal Samsung HDD Serial Number S1FXJ80S605503;

- (2) Falcon Desktop Computer, Serial Number AT991931 with internal Western Digital HDD Serial Number WCANK7042124; and
- (3) Miscellaneous CDs and DVDs;

Jeffrey Woolley

- (1) Dell Inspiron E1505, Serial Number DNPC3D1 with internal hard drive Samsung HM080HI, Serial Number SOYXJ10P620138;
- (2) 4GB Memorex Thumb Drive;
- (3) Western Digital Portable Hard Drive, Electronic Serial Number 575836314139325335323738;
- (4) Western Digital Portable Hard Drive, Electronic Serial Number 575842314131315537363030;
- (5) Quantum Fireball Hard Drive, Serial Number 376832074954; and
- (6) Western Digital Portable Hard Drive, Electronic Serial Number 575841304141394A33333836;

Tony Bronson

- (1) Accordion folder containing hand drawn depictions of child pornography;
- (2) 63 miscellaneous thumb drives;
- (3) Hewlett Packard Pavilion a305W, Serial Number CNC3350DLC with internal Western Digital HDD, Serial Number WCAATH100345;
- (4) Toshiba 593500-C USB3 external hard drive, Serial Number 31SCF06LSPR5;
- (5) PNY 4GB #64, Electronic Serial Number 000000000004B4;
- (6) Maxell 4GB #65, Electronic Serial Number 07B21A0B223931C4;
- (7) Maxell 4GB #66, Electronic Serial Number 07B2190BF57C046D;
- (8) PNY C04G 4GB MicroSD#67;
- (9) Dane-Elec 8GB #69, Electronic Serial Number 07BA138019990CF7;
- (10) PNY Attache 16GB #89, ESN AAB20B2300000425; and
- (11) Miscellaneous CDs and DVDs;

Charles Crosby

- (1) Gateway GT5464, Serial Number RN1009563710-0402 with internal Seagate ST3320820AS HDD, Serial Number 6QF0X0EB;
- (2) Generic 2GB Thumb Drive, Electronic Serial Number LHDD1106271545545573;

- (3) Miscellaneous CDs and DVDs; and
- (4) HP Compaq Computer S/N MXL740055P;

Scott Long

(1) Dell Desktop Computer Serial Number DSYMS81 with internal 80 GB Seagate Hard Disk Drive Serial Number 5MR42BM2;

Joshua Petersen

- (1) HP-Pavilion 500-054 Desktop Computer, Serial Number 3CR3210F51 with internal Seagate hard drive, ST1500DM003, Serial Number W240NKXY;
- (2) Maxtor Internal 60GB Hard Drive Model 5T060H6, Serial Number T6H4MATC;
- (3) Seagate Goflex USB Drive with external serial number of NA1Q0Y93; and
- (4) Western Digital Portable Drive with external serial number of WCAPW2831366;

Steven Grovo

- (1) HP Pavilion A600 S/N MXX81106YZ; and
- (2) Lenovo Think Centre Desktop S/N 870535ULKZC91;

Ian Nosek

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(1) Recordable Camera Pen (no identifiable serial number);

pursuant to 18 U.S.C. § 2253(a).

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A TRUE BILL.

FOREPERSON

MICHAEL W. COTTER
United States Attorney

Attorney for Plaintiff

KRÍ\$ A. McLEAN

Criminal Chief Assistant U.S. Attorney

Attorney for Plaintiff

Crim. Summons Woolley 1:30p.m. Before
Warrant: Petersen, Grovo

Bail: all others usms custod